

**SAN NICOLAS LAW OFFICE, LLC**  
**Joey P. San Nicolas, Esq. (F0342)**  
**2nd Floor, ICCI Bldg. (Middle Road)**  
**P.O. Box 10,001 PMB 602**  
**SAIPAN, MP 96950**  
**670-234-7659 (SNLW)**  
**sannicolaslaw@gmail.com**

Attorney for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**BEST SUNSHINE INTERNATIONAL LTD  
(BVI); IMPERIAL PACIFIC  
INTERNATIONAL (CNMI), LLC,**

Plaintiffs,

vs.

**COMONWEALTH CASINO COMMISSION,  
AS AGENCY OF THE COMMONWEALTH  
OF THE NORTHERN MARIANA ISLANDS,**

Defendant.

Civil Case No. 1:22-cv-00007

**SAN NICOLAS LAW OFFICE,  
LLC’S NOTICE OF MOTION AND  
MOTION TO WITHDRAW AS  
COUNSEL FOR DEEFENDANT  
IMPERIAL PACIFIC  
INTERNATIONAL (CNMI), LLC**

**Judge: RAMONA V. MANGLONA**  
**Time:**  
**Date:**

PLEASE TAKE NOTICE that on \_\_\_\_\_, 2022, at \_\_\_\_\_ a.m./p.m., or as soon thereafter as San Nicolas Law Office, LLC (“SN Law”) may be heard, SN Law will move and hereby does respectfully move to withdraw as counsel for Plaintiffs Best Sunshine International, Ltd. and Imperial Pacific International (CNMI), LLC.

The basis for this Motion is that professional considerations warrant withdrawal. Comment 3 to Rule 1.16 of the ABA Model Rules of Professional Conduct states that a statement that “professional considerations require termination of the representation” ordinarily should be accepted as sufficient, and lawyers should be mindful of the confidentiality obligations to their clients. Should the Court require additional information as to the basis for the withdrawal, SN Law

1 respectfully requests the Court to permit SN Law to submit confidential client information under  
2 seal.

3 Respectfully submitted this 3<sup>rd</sup> day of October, 2022.  
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5 /s/ Joey P. San Nicolas  
6 JOEY P. SAN NICOLAS  
7 Attorney for Plaintiffs  
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